

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

PRESIDENT AND FELLOWS OF HARVARD
COLLEGE,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
HEALTH AND HUMAN SERVICES, et al.,

Defendants.

Case No. 1:25-cv-11048-ADB

**[PROPOSED] ORDER GRANTING PLAINTIFF'S
MOTION FOR SUMMARY JUDGMENT**

The Court hereby grants Plaintiff's Motion for Summary Judgment.

1. The Court declares unlawful, vacates, and sets aside the Freeze Orders and Termination Letters. All freezes and terminations of funding to Plaintiff made pursuant to the Freeze Orders and Termination Letters on or after April 14, 2025, are vacated and set aside.

2. Defendants, their agents, and anyone acting in concert or participation with Defendants are hereby permanently enjoined from:

A. Implementing, instituting, maintaining, or giving any force or effect to Defendants' Freeze Orders, Termination Letters, and attendant unconstitutional conditions, as well as any terminations of, freezes of, or refusals to grant or to continue federal funding undertaken pursuant to the Freeze Orders and Termination Letters, including:

- i. The April 3, 2025 Letter from the Federal Task Force to Combat Antisemitism;
- ii. The April 11, 2025 Letter from the Federal Task Force to Combat Antisemitism;
- iii. The April 14, 2025 Freeze Order;

- iv. The May 5, 2025 Freeze Order;
- v. The May 6, 2025 Termination Letter from the National Institutes of Health;
- vi. The May 9, 2025 Termination Letter from the United States Department of Agriculture;
- vii. The May 12, 2025 Termination Letter from the Department of Commerce;
- viii. The May 12, 2025 Termination Letter from the Department of Defense;
- ix. The May 12, 2025 Termination Letter from the Department of Energy;
- x. The May 12, 2025 Termination Letter from the Department of Housing and Urban Development;
- xi. The May 12, 2025 Termination Letter from the National Science Foundation;
- xii. The May 12, 2025 Termination Letter from the Centers of Disease Control and Prevention;
- xiii. The May 20, 2025 announcement by the Department of Health and Human Services to cut \$60 million in multi-year grants to Plaintiff; and
- xiv. The May 27, 2025 Termination Letter from the General Services Administration.

B. Issuing any other termination, freezing of funds, stop work orders, or withholding of payment on existing grants or other federal funding, or refusal to award future grants, contracts, or other federal funding to Plaintiff in retaliation for the exercise of its First Amendment rights, or on purported grounds of discrimination without compliance with the terms of Title VI.

It is so ordered.

Allison D. Burroughs

United States District Judge

Date _____